

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

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**Business Casual Holdings, LLC, a Delaware limited liability company**

**Plaintiff**

**Case No.: 1:21-cv-02007-JGK**

**vs.**

**TV-Novosti, a Russian autonomous non-profit organization**

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**Defendant**

**AFFIDAVIT OF DUE DILIGENCE**

I, Ambiko Wallace, a Private Process Server, having been duly authorized to make service of the Summons, Complaint and Demand for Jury Trial with Exhibits, and First Amended Complaint with Exhibits in the above entitled case, hereby depose and say:

That I am over the age of eighteen years and not a party to or otherwise interested in this matter.

That after due search, careful inquiry and diligent attempt(s), I have been unable serve TV-Novosti with the above named process.

That on April 29, 2021 at 1:18 PM, I attempted to serve TV-Novosti at 1325 G Street, NW, Suite 250, Washington, DC 20005. On this occasion, I was stopped in the building lobby by a security guard. The guard stated that Suite 250 was on a secure floor and that she needed to call the suite, so that an employee of the suite would come to the lobby to receive me. The security guard would not allow me to access Suite 250 directly, so I could not see if there was any signage for RT America or RTVV America used at the location. After the guard called suite 250, an employee who worked in the suite came to the building lobby to meet with me. The employee, who stated that he was an engineer, had no accent. I informed the employee that I was there to deliver legal documents to TV-Novosti. The employee reviewed the documents in my presence. After reviewing the documents, the employee stated that his company had no affiliation with TV-Novosti and that he was not authorized to accept service on their behalf. The employee further stated that the office manager, a woman named Kes, might know who would be the point of contact for TV-Novosti. Then the employee stated that Kes was out of the office until the following week. The employee provided the telephone number 202-942-7440 for Kes, but I did not receive an answer after calling the phone number. Finally, I left a voicemail for Kes, but I did not receive return call.

That on May 3, 2021 at 12:23 PM, I attempted to serve TV-Novosti at 1325 G Street, NW, Suite 250, Washington, DC 20005. On this occasion, the same building security guard asked me to wait in the lobby while she called Suite 250 from the front desk. The security guard again would not allow me to attempt service at the suite directly. The security guard called suite 250, but they were unable to summon anyone from the suite to the building lobby. I again attempted to call Kes at 202-942-7440, but I did not receive an answer after calling. Finally, I left another voicemail for Kes, but I received no return call.

That on May 4, 2021 at 1:52 PM, I attempted to serve TV-Novosti at 1325 G Street, NW, Suite 250, Washington, DC 20005. On this occasion, the same guard was unable to summon anyone from Suite 205 to the building lobby. I asked the guard to call again. The guard stated that they would only call the suite one time because the only person in Suite 250 was the same employee that I spoke with on my first attempt. I tried to call the office manager Kes again at 202-942-7440, but the call went unanswered. Finally, I left another voicemail for Kes, but I did not receive a return call.

I declare under penalty of perjury that this information is true.

5/25/21

Executed On

Ambiko Wallace



Client Ref Number:N/A

Job #: 1589154

Capitol Process Services, Inc. | 1827 18th Street, NW, Washington, DC 20009 | (202) 667-0050